

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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EUROPA MARITIME S.A.,

08 Civ. 9523 (DAB)

Plaintiff,

-against-

DECLARATION IN
RESPONSE TO ORDER

MANGANESE TRANS ATLANTIC CORPORATION;
MANAGERS SYSTEMAR CO LTD; EMPIRE
CHEMICAL, LLC and PRIVAT INTERTRADING,

Defendants.

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I, Garth S. Wolfson, hereby declare as follows:

1. I am a partner with the firm of Mahoney & Keane, LLP, counsel of record for the plaintiff in the above-captioned action. As such, I am familiar, based upon my personal knowledge and my review of the file maintained by my office, with the prior pleadings and proceedings in this case. I respectfully submit the Declaration pursuant to the Court's Order dated April 19, 2012.

2. By way of compliance, herewith attached are true copies of Your Declarant's letter to the Court of even date, including, without waiver of privilege, its enclosed status report specifically prepared by plaintiff's London solicitors for submission to the Court.

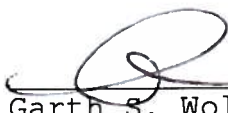
I declare under penalty of perjury that the foregoing is true
and correct.

Dated: New York, New York
April 25, 2012

Respectfully submitted,

MAHONEY & KEANE LLP.
Attorneys for Plaintiff

By:



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